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ALEXANDER MIRKIN
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April 29, 2022

Via ECF

Hon. Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
Courtroom 619
New York, NY 10007

Re: PT Aurora Indonesia Trading and Jin Maa Trading Limited v.
USARM GROUP LLC, Civil Action No. 20 Civ. 7045

Dear Judge Ramos:

We represent Defendant USARM Group, LLC in the above-referenced matter, and write to respectfully request leave to file a letter motion under seal containing confidential information in redacted form, pursuant to Section 3.ii. of Your Honor's Individual Practice Rules and Section 6 of the Electronic Case Filing Rules and Instructions for this District.

The contemplated letter-motion seeks leave for our firm to withdraw as counsel of record in this case, and, to establish that the requirements of Local Rule 1.4 are met, discloses information that is arguably confidential as that term is defined in New York Rule of Professional Conduct 1.6(a). While our client has consented to the withdrawal, and to the disclosure to the Court and opposing counsel of the confidential information in the contemplated letter-motion, the information is nevertheless "likely to be embarrassing or detrimental to the client if exposed," *id.*, so we have an ethical obligation to "make reasonable efforts to prevent the . . . unauthorized disclosure or use of, or unauthorized access to" this information. Rule 1.6(c). Accordingly, to be able to establish good cause for our motion to withdraw without disclosing client confidences, we request leave to file the contemplated letter-motion under seal. Courts in this district have accepted such requests, going so far as to consider such motions on an *in camera*, *ex parte* basis. *See, e.g., L.V. v. New York City Dep't of Educ.*, No. 19 Civ. 5451 (AT) (KHP), 2020 WL 6782234, at *2 (S.D.N.Y. Nov. 17, 2020).

We thank that Court for its consideration of this request.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Alex Mirkin", written over a horizontal line.

OFFIT KURMAN, P.A.

By: Alexander Mirkin